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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JPMORGAN CHASE BANK, N.A., a
national banking association,

Plaintiff,

vs.

SFR INVESTMENTS POOL 1, LLC, a
Nevada limited liability company; THE
WILLOWS HOMEOWNERS'
ASSOCIATION, a Nevada non-profit
corporation; DANIEL A. RICHARD, an
individual,

Defendants.

Case No. 2:17-CV-00324-GMN-PAL

**STIPULATION AND ORDER TO
EXTEND SCHEDULING ORDER
DEADLINES BY 60 DAYS**

(Second Request)

1 SFR INVESTMENTS POOL 1, LLC, a
2 Nevada limited liability company,
3
4 Counterclaimant/Cross-Claimant,
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6 vs.
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8 JPMORGAN CHASE BANK, N.A.;
9 DANIEL A. RICHARD, an individual,
10
11 Counter-Defendant/Cross-Defendants.

12 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan
13 Chase Bank, N.A. ("Chase"), Defendant/Counterclaimant/Cross-Claimant SFR
14 Investments Pool 1, LLC ("SFR"), and The Willows Homeowners Association
15 ("Willows"), by and through their respective counsel of record, stipulate and request
16 that this Court extend discovery and dispositive motion deadlines in the above-
17 captioned case for 60 days, to permit the parties to complete party depositions, and
18 specifically the deposition of Chase, whose designated witness must undergo
19 significant surgery in December, from which she will not have recuperated until at
20 least the end of January or beginning of February 2018. The parties have conferred
21 and agree that this brief extension is the most reasonable way to complete discovery
22 in this case, including so that Chase's designated witness has sufficient time to
23 attend to necessary medical treatment.

24 This is the parties' second request for an extension to the scheduling order
25 deadlines, which were submitted in compliance with LR 26-1. The parties make this
26 request in good faith and not for purposes of delay.

27 **I. Discovery Completed to Date**

28 To date, Chase has served the following discovery: initial disclosures; initial
expert disclosure; requests for production to SFR; interrogatories to SFR; notice of
Rule 30(b)(6) deposition of SFR; requests for production to Willows; interrogatories to
Willows; notice of Rule 30(b)(6) deposition of Willows; subpoena to produce
documents on non-party Absolute Collection Services, LLC; and subpoena to testify

1 at a deposition on non-party Absolute Collection Services, LLC.

2 To date, SFR has served the following discovery: initial disclosures; requests
3 for production to Chase; interrogatories to Chase; requests for admission to Chase;
4 and notice of Rule 30(b)(6) deposition of Chase. SFR has also responded to Chase's
5 requests for production and interrogatories to SFR.

6 To date Willows has served the following discovery: requests for production to
7 Chase; interrogatories to Chase; and requests for admission to Chase.

8 **B. Specific Description of Discovery that Remains to be Completed**

9 SFR has noticed a Rule 30(b)(6) deposition of Chase. As discussed below,
10 however, the parties seek to reschedule Chase's deposition to occur after the current
11 discovery cutoff of January 4, 2018.¹ Chase has also noticed depositions of SFR,
12 Willows, and non-party Absolute Collection Services, LLC. Chase is currently
13 preparing its responses/objections to SFR's requests for admission to Chase, requests
14 for production to Chase, and interrogatories to Chase. Chase is also currently
15 preparing its responses/objections to Willows's requests for admission to Chase,
16 requests for production to Chase, and interrogatories to Chase. Willows is currently
17 preparing its responses/objections to Chase's requests for production to Willows and
18 interrogatories to Willows.

19 **C. Good Cause Exists for the Requested Extension**

20 SFR has noticed Chase's deposition for December 12, 2017, but Chase's Rule
21 30(b)(6) designee is unavailable on this date because the designee will be undergoing
22 significant surgery in December, from which she will need to recuperate until at least
23 the end of January or beginning of February 2018. The parties have met and
24 conferred about rescheduling Chase's deposition in this lawsuit to take place during
25 the week of February 12-16, 2018, when the Chase designee should be recuperated

26
27 ¹ The parties further reserve their rights to meet and confer and, if necessary, engage
28 in motion practice regarding any discovery issues that may arise.

1 from surgery and able to travel to Las Vegas. This is the parties' second request to
2 extend the standard, 180-day discovery period in this case, and they seek the
3 extension so that Chase's designated witness may have an opportunity to receive
4 necessary medical treatment and recover from the same. The parties have diligently
5 engaged in discovery to date and seek this extension in good faith.

6 **D. Proposed Discovery Deadlines**

7 The parties request an order extending the close of discovery, the deadline to
8 file dispositive motions, and the deadline to file a pre-trial order by 60 days.

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Event	Current Deadline ²	New Deadline
Close of Discovery	January 4, 2018	March 5, 2018
Dispositive Motions	February 5, 2018	April 5, 2018
Pre-Trial Order	March 2, 2018	May 2, 2018

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27 ² See Scheduling Order, ECF No. 50.

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This extension is reasonable and necessary given the good cause set forth above.

IT IS SO STIPULATED.

Dated: December 11, 2017

BALLARD SPAHR LLP

KIM GILBERT EBRON

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ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 18, 2017